

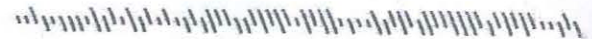
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AUGUSTA GA 309

18 AUG 2017 PM 11

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17 AUG 23 AM 9:13
PERMITS BRANCH
6WQ-P

Dear Mr. Chen,

I was very surprised and disappointed to learn that the frequency of produced water toxicity testing in the new GMG290000 permit will remain unchanged. I can not comment on the permit directly as my employer is and Oil & Gas company. I did work in commercial labs and a municipality before and am a little familiar with NPDES requirements for onshore discharges. The differences between offshore and onshore toxicity tests are crazy. I would not expect a municipality to have the same pollution effect as produced water. Onshore discharges are visible and any bad effect easy to see but offshore discharges are below the surface and seldom seen by the public or guys like you.

Produced water on the facility I'm on has complicated and varied chemical treatment program....much higher volumes, numbers of different chemicals, and dosage rates than for the municipality I worked for. Different produced waters come on and off and the chemical treatment program is ever changing not at all like a municipality or plant.

I've always been uncomfortable with the lower burden placed on offshore versus onshore dischargers: single grab for a 7-day chronic test, annual testing, no real penalty for failure versus 3 separate 24-hr composite samples for a 7-day test, quarterly or monthly sampling, and potential for quarterly testing for the life of the permit. Explained the low burden and high burden option, the public and water experts would wrongfully assume that the high burden was on the offshore produced water discharges.

My company and others was up in arms about quarterly or twice yearly toxicity tests in the new GMG permit. The cost argument is weak as it is nothing compared to what we spend every single hour but doubling the chance of catching a "bad" grab sample was their concern. I heard

several versions of comments about the increased sampling and testing being impossible for labs. That is a load of crap. When I worked in a lab, the tests were front loaded in the 1st half of the year and the 2nd ½ of the year was very slow. This created staffing problems for the lab I worked at....busy in 1st ½ of year, then layoffs and slower in 2nd ½ of year. This definitely had a poor effect on data quality because we could not keep our staff employed from year to year and had significant annual turnover. I was in that turnover to many times and went to work for a municipality.

Twice yearly toxicity tests would level of staffing needs for labs and increase data quality. No real changes besides that for labs. The organisms are produced at high rate for 1st part of year and then wasted 2nd part of year.

cc: Brent Larsen